

REMARKS

In view of the amendments proposed above, Applicants respectfully request consideration of the following remarks.

Information Disclosure Statement

The Examiner indicated that certain references contained in the Applicants' Information Disclosure Statement (IDS) filed on March 29, 2001, were not considered by the Examiner. More specifically, the Examiner indicated that he was unable to locate the following two references: (1) *Windows NT Device Driver Development*; and (2) *The Windows NT Device Driver: A Guide for Programmers*. Office Action, at pg. 2.

Applicants submit with this response an IDS citing the above-noted references, as well as copies of each of these references, and Applicants respectfully request consideration of these references.

Also, it is noted that Applicants' IDS of March 29, 2001, cited a number of patent documents; however, the Examiner did not return an initialed copy of this IDS indicating consideration of these patents. Thus, Applicants respectfully request consideration of the patents cited in the IDS of March 29, and that the Examiner return an initialed copy of this IDS.

Specification

The Examiner noted that the Applicants referred to a number of references in the Background section of the specification and, further, the Examiner requested that the Applicants supply copies of these references. The aforementioned references are cited on

the IDS submitted with this response, and copies of these references are also provided with this response.

Rejections Under 35 U.S.C. § 101

Claims 1-11, 31, and 32 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Office Action, at pgs. 2-3. Applicants have amended each of independent claims 1 and 8 as suggested by the Examiner to overcome these rejections.

Anticipation Rejections Under 35 U.S.C. § 102

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Anticipation Rejection Based on U.S. Patent 6,772,189 to Asselin

Claims 1, 2, 5-8, 10-16, 18-21, 24-27, and 29-35 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent 6,772,189 to Asselin (hereinafter "Asselin"). Applicants respectfully traverse this rejection as set forth below.

Claim 1, as amended, recites:

1. A computer implemented method comprising:

requesting a first deferred procedure call for a first interrupt event associated with a source;
requesting at least one other **different** deferred procedure call for a second interrupt event associated with the source, wherein the first interrupt event comprises one type of event and the second interrupt event comprises another type of event;
assigning the first deferred procedure call and the at least one other deferred procedure call to a resource;
processing the first interrupt event with the first deferred procedure call; and
processing the second interrupt event with the at least one other deferred procedure call.

Each of independent claims 8, 20, and 27 recites some limitations similar to those recited in claim 1.

Independent claim 12, as amended, recites:

12. A driver comprising:
an interrupt handler to identify interrupt events associated with a source;
a first deferred procedure call, the first deferred procedure call to process a first type of the interrupt events; and
a second **different** deferred procedure call, the second deferred procedure call to process a second type of the interrupt events.

Independent claim 15, as amended, recites some limitations similar to those recited in claim 12.

Referring, for example, to claim 1 above, one embodiment of the claimed invention is directed to a method for handling multiple interrupt events using at least two different deferred procedure calls, each of the two deferred procedure calls corresponding to a certain type of interrupt event. Similarly, referring to claim 12 above, one embodiment of the claimed invention is directed to a driver including two different

deferred procedure calls, each of the deferred procedure calls corresponding to a certain type of interrupt event.

In contrast, Asselin discloses a scheme for processing multiple interrupts by creating multiple instances of the same deferred procedure call. As stated at column 6, lines 30-33, Asselin “solves this problem by creating a set of DPC objects and associated work lists determined by the number of processors installed in the machine, not the number of interrupts or devices that are being used.” As further stated in Asselin, at column 5, lines 53-60:

The ISR queues a work item on a selected work list and then queues a selected DPC by calling KeInsertQueueDpc() with a parameter corresponding to a DPC object that has been created, if the work list was empty prior to queuing the work item on the work list. If the list was not empty, the DPC object has already been queued, since the DPC routine will remove all items from the list when it is called. This prevents the ISR from queuing the same DPC multiple-times.

As Asselin fails to disclose at least the above-noted limitations of independent claims 1, 8, 12, 15, 20, and 27, each of these claims is novel in view of this reference. Also, claims 2, 5-7, 10-11, 13-14, 16, 18-19, 21, 24-26, and 29-35 are allowable as depending from their respective novel independent claims.

Obviousness Rejections Under 35 U.S.C. § 103

To reject a claim or claims under 35 U.S.C. § 103, the Examiner bears the initial burden of establishing a prima facie case of obviousness. M.P.E.P. § 2142. When

establishing a prima facie case of obviousness, the Examiner must set forth evidence showing that the following three criteria are satisfied:

First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references (or references when combined) must teach or suggest all the claim limitations. M.P.E.P. § 2143.

The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on the applicant's disclosure. M.P.E.P. § 2142 (citing *In re Vaeck*, 20 U.S.P.Q.2d 1438 (Fed. Cir. 1991)). Also, the evidentiary showing of a motivation or suggestion to combine prior art references "must be clear and particular." *In re Dembiczak*, 175 F.3d 994, 999, 50 U.S.P.Q.2d 1614, 1617 (Fed. Cir. 1999).

Obviousness Rejection Based on U.S. Patent 6,772,189 to Asselin in View of U.S. Patent 6,378,004 to Galloway et al.

Claims 3, 4, 9, 17, 22, 23, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Asselin in view of U.S. Patent 6,378,004 to Galloway (hereinafter "Galloway"). Applicants respectfully traverse this rejection as set forth below.

As previously set forth, Asselin fails to disclose the above-noted limitations of each of independent claims 1, 8, 15, 20, and 27, and Galloway also fails to disclose these limitations. Thus, Asselin and Galloway, either individually or in combination, fail to disclose at least the above-noted limitations of independent claims 1, 8, 15, 20, and 27,

and these claims are non-obvious in view of these references. If an independent claim is nonobvious, then any claim depending from the independent claim is also nonobvious. M.P.E.P. §2143.03 (citing *In re Fine*, 5 U.S.P.Q.2d 1596 (Fed. Cir. 1988)). Therefore, claims 3-4, 9, 17, 22-23, and 28 are allowable as depending from nonobvious, independent claims 1, 8, 15, 20, and 27, respectively.

Application Ser. No. 09/823,155

Docket No. P10774


CONCLUSION

Applicants submit that claims 1-35 are in condition for allowance and respectfully requests allowance of such claims.

Please charge any shortages and credit any overages to Deposit Account
No. 02-2666.

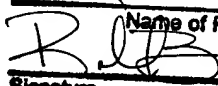
Respectfully submitted,

Date: April 15, 2005


Kerry D. Tweet
Registration No. 45,959

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, CA 90025
(503) 684-6200

I hereby certify that this correspondence is being deposited with
the United States Postal Service as first class mail with sufficient
postage in an envelope addressed to Commissioner for Patents,
P.O. Box 1450, Alexandria, VA 22313 on.

4-15-05
Date of Deposit
Rachael Brown
Name of Person Mailing Correspondence

Signature
4/15/05
Date